

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

JGW/JCM: USAO # 2017R00845

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2018 JAN 25 PM 3:30

UNITED STATES OF AMERICA

* CRIMINAL NO.

v.

*
* UNDER SEAL

STEWART SACHS,

* (Money Laundering, 18 U.S.C. §
* 1956(a)(3)(B); Aiding and Abetting, 18
* U.S.C. § 2; Forfeiture, 18 U.S.C. §
* 982(a)(1), 21 U.S.C. § 853; 28 U.S.C. §
* 2461)

Defendant.

INFORMATION

COUNT ONE
(Money Laundering)

The Acting United States Attorney for the District of Maryland charges that:

On or about March 19, 2013, in the District of Maryland, the defendant,

STEWART SACHS,

did knowingly conduct and attempt to conduct a financial transaction, affecting interstate and foreign commerce, which transaction involved property represented by law enforcement or another person acting at the direction of law enforcement to be the proceeds of a specified unlawful activity, that is, proceeds from the sale of narcotic drugs, with the intent that the financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, to wit, he did receive \$425,000, more or less, in United States currency, said currency being property represented to be the proceeds from the sale of narcotic drugs, for the purchase of real estate in the name of a surrogate.

18 U.S.C. § 1956(a)(3)(B)
18 U.S.C. § 2

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FORFEITURE

Upon the conviction of an offense in violation of 18 U.S.C. § 1956(a)(3)(B), the defendant shall forfeit the following property to the United States pursuant to 18 U.S.C. § 982(a)(1):

- a. any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- b. any property real or personal –
 - 1. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted;
 - 2. that is used to facilitate, or intended to be used to facilitate, the commission of the offense of which the person is convicted.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). If the United States is not able to forfeit the specific property listed above directly, it intends to forfeit it as substitute property.

18 U.S.C. § 982(1);
21 U.S.C. § 853;
28 U.S.C. § 2461(c)

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Stephen M. Schenning / JCM
STEPHEN M. SCHENNING
Acting United States Attorney

Date: 1/24/2018